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14 MAY 1987

Draft Record of Decision for the Johns-Manville Site,
Maukegan, Illinois

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This is the Great Lakes National Program Office's review of the Draft Record of Decision (DROD) for the Johns-Manville Site in Maukegan, Illinois. We feel that the recommended alternative, soil covering with vegetation, provides adequate protection from airborne asbestos. Nevertheless, deficiencies in the Remedial Investigation and the failure to recognize potential impacts upon Lake Michigan preclude DROD concurrence with the draft DROD (a detailed listing of these deficiencies constitutes Attachment A).

It has been generally agreed during staff level discussions between EIL/DPO and Water Division that the geotechnical and ground water investigation for this site was inadequate in a number of ways including the number, type and location of monitoring wells, and the number of analyses. These inadequacies coupled with lack of evidence of proper quality assurance practices, render the conclusions based upon these investigations questionable. Ultimately, the impact of this site upon surface and ground waters in the area is unknown. Questions regarding the toxic loading of Lake Michigan at this site, in violation of the 1978 Great Lakes Water Quality Agreement, are unanswerable. Recommended language for portions of the DROD which address institutional requirements are found in Attachment B.

The lack of evidence of a source identification program as part of the Remedial Investigation is especially troublesome. In particular, the amounts, grade, use and disposal of xylene, pentachlorophenol, 4-nitrophenol, arsenic, lead, chromium and thiram have not been discussed adequately in the Remedial Investigation. It is not clear whether other chemical agents used in present or past processes and disposed of at this site, such as toluene or "PCS-wells" described in a Johns-Manville Waste Disposal Plan dated June 17, 1982 present environmental hazards. Nor is it clear whether the current state of "PCS-wells" or "PCS" permitting is adequate.

These deficiencies in the Remedial Investigation, however, can be adequately addressed during the process of the Consent Agreement negotiations driven by this DROD. In particular, the ground water investigation and contingency plan proposed in the draft DROD should be developed through consultations with our Office. A source identification program, as called for by CERCLA, should be included as part of the Remedial Action Plan in order to assess all possible environmental impacts from past and present activities at this site. In the case of the Johns-Manville site, the source investigation and the ground water investigation should precede implementation of the soil covering portion of the Remedial Action.

If requested, CLMPP could provide support in characterizing industrial processes and materials handling practices at this plant, in order to identify specific contaminants associated with these processes and practices. The recommended elements of future source identification programs, future ground-water investigations, and contingency plans are found in Attachments C and E.

We wish to remain actively involved in activities at this site in order to provide support for the CLMPP position in the resulting negotiated settlement with Naville Sales. A cooperative effort between HSO, CLMPP and the other divisions at this site will result in an agreement which implements NARPs.

Questions regarding this review should be addressed to Mr. Victor Taylor at (312) 953-7477, or to Mr. James Brackweidius at (312) 953-2617 in his absence.

Attachment

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